

**THE CANADIAN ASSOCIATION
OF BUSINESS STUDENTS**

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PRIVACY POLICY

POLICY COORDINATORS

Chairperson
Board of Directors
chair@cabsonline.ca

President and Chief Executive Officer
CABS Management Team
president@cabsonline.ca

DATE EFFECTIVE

September 26, 2019

Upon being duly motioned and seconded and in witness herein, we hereby acknowledge that the content of this document represents the true nature of the Privacy Policy of the Corporation of the CANADIAN ASSOCIATION OF BUSINESS STUDENTS, INC. [The Corporation], which has been approved by a 2/3 majority vote of the Board of Directors of [The Corporation], at the Board meeting held November 15, 2014. We further acknowledge that this Policy shall be interpreted under the laws in effect in the province of Ontario, judicial district of Mississauga (the original place of incorporation)

GENERAL PROVISIONS

1. PURPOSE AND SCOPE

- a. The Canadian Association of Business Students is committed to protecting the privacy of individuals who interact with the CABS in accordance with the standards set out in the *Personal Information Protection and Electronic Documents Act* (PIPEDA). The purpose of this policy is to make clear the obligations of the Corporation in regards to the collection and use of personal information.
- b. The scope of this policy includes Personal Information in the custody or under the control of the CABS, including any and all Personal Information in the custody or control of any sub-body of the CABS duly charged with organizing any CABS Event.

2. DEFINITIONS

- a. The following terms that appear in this policy are hereby defined in the Policy of Definitions; terms that do not appear in that list of definitions but do appear in the “Definitions” section of the Bylaws of the Corporation are equally enforceable in this policy.

3. ACCOUNTABILITY

- a. The responsibility of the day-to-day management and use of personal information rests primarily with the CABS Management Team.
- b. The responsibility to enforce this policy rests with the CABS Board of Directors.
- c. Additionally, a Vice President, Information Technology (VP IT), may be appointed to:
 - i. Coordinate the development and implementation of policies and procedures to manage the CABS's compliance with PIPEDA;
 - ii. Provide support services to the CABS Board of Directors and Officers on matters pertaining to the protection of Personal Information.
- d. If no VP IT is appointed, the President may appoint another Officer to fulfill the duties of the VP IT.

4. COLLECTION OF PERSONAL INFORMATION

- a. The Organization may collect personal information only where:
 - i. The information relates directly to and is necessary for an operating program or activity of the Organization;
 - ii. The collection of information is expressly authorized by an enactment of Canada; and
 - iii. The information is collected for the purposes of law enforcement.
- b. The Organization will collect personal information directly from the individual the information is about unless there is a reasonable requirement to collect from another source and the indirect collection is permitted under PIPEDA.
- c. Details relating to the purpose for the collection of personal information will be provided to the individual when personal information is collected directly from the individual.

5. USE AND DISCLOSURE OF PERSONAL INFORMATION

- a. Personal Information will not be used or disclosed for a purpose other than the purpose for which it was collected, or for a use consistent with that

purpose except with the consent of the individual, or as permitted under PIPEDA.

- i. It is not considered to be an unreasonable invasion of a student's privacy to release data pertaining to the following information:
 1. Aggregate data regarding majors and minors studied by students;
 2. Aggregate data regarding attendance at or participation in a public event or activity; or
 3. Personal Information already in the public domain.

6. ACCURACY AND RETENTION OF PERSONAL DOMAIN

- a. The Organization will take reasonable steps to ensure that Personal Information in its custody is accurate and complete.
- b. Individuals must contact a Officer to correct or update personal information.
- c. The Organization must update this information within the following seven (7) calendar days of the initial request.
- d. The Organization will retain Personal Information only as long as necessary for the fulfillment of its purposes.

7. SECURITY AND ACCESS TO INFORMATION

- a. The Organization will take reasonable steps to protect information from unauthorized access, collection, use, disclosure or destruction.
- b. Any requests for the knowledge of and access to Personal Information about themselves may be directed to any Officer.
- c. The Organization must provide the Personal Information within the following seven (7) calendar days of the initial request.

8. QUESTIONS, COMPLAINTS, AND VIOLATIONS

- a. The designated Officer will respond to questions or concerns about the Organization's management or treatment of personal information.
- b. Violators of this policy may be subject to penalties under CABS by-laws and applicable law.